

AO 91 (Rev. 01/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the  
Southern District of Ohio

United States of America  
v.  
Patrick MAHONEY  
3661 Creekwood Ave  
Columbus, OH 43223

*Defendant*

Case No. 2-12-MJ-124

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of Feb 17, 2012 in the county of Franklin in the Southern District of  
Ohio, the defendant violated 18 U. S. C. §2422 (b), an offense described as follows:

Knowingly attempt to entice a minor to engage in sexually explicit conduct using a facility of interstate commerce.

This criminal complaint is based on these facts:

See attached Affidavit


☒ Continued on the attached sheet.

  
Complainant's signature

Cameron Bryant, Special Agent HSI  
Printed name and title

Sworn to before me and signed in my presence.

Date: February 17, 2012

  
Judge's signature

City and state: Columbus, Ohio

Mark R. Abel, U.S. Magistrate Judge  
Printed name and title

## AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Cameron Bryant, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent of the Immigration and Customs Enforcement, Homeland Security Investigations (HSI), assigned to the Office of the Resident Agent in Charge, Columbus, Ohio (RAC/CU). I make this affidavit in support of an application for a criminal complaint against, there being probable cause to believe that MAHONEY has committed violations of Title 18, United States Code, Section 2251.

2. This affidavit is based upon your affiant's conversations and coordinated efforts with other law enforcement agents and sources as well as the affiant's first-hand knowledge. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, your affiant did not include each and every fact known concerning this investigation. Your affiant did not withhold any information or evidence that would negate probable cause. Your affiant set forth only the facts that are believed to be necessary to establish probable cause that **Patrick MAHONEY** committed the violations listed above.

3. On February 6, 2012, Franklin County Sheriff's Office Internet Crimes Against Children Task Force Detective Brett Peachy acting in an undercover capacity engaged in internet chats via Yahoo! Messenger with a subject using the username, "godofemptyness" (later identified as Patrick MAHONEY of Columbus, Ohio). During the course of the chats, the subject continuously discussed his desire to engage in sexual activity specifically oral sex and intercourse with children. MAHONEY also indicated that he had engaged in sexual contact with his 12 -year old stepdaughter.

4. On February 14, 2012, MAHONEY sent a file containing child pornography to Detective Peachey. MAHONEY indicated to Det. Peachey that his computer had crashed and that he was looking for a way to replenish his collection of child pornography.

5. On February 15, 2012, Franklin County Sheriff's Office Internet Crimes Against Children Task Force Detective Shook, also acting in an undercover capacity (as a 15 year old girl) engaged in internet chats via Yahoo! Messenger, with MAHONEY. During the course of these chats MAHONEY expressed an interest in engaging in sexual intercourse, oral and anal sex with the child.

6. On February 16, 2012, 11:31 am, MAHONEY, engaged in a chat with DET. Shook's undercover persona, MAHONEY indicated that he wanted to meet what he believed to be the 15-year-old child. The conversation was sexually explicit, and contained details depicting desire to engage in intercourse, oral and anal sex with the child. While planning the meeting MAHONEY asked if she should bring condoms, or if the child was on the pill. The meeting was arranged for February 17, 2012, at 9:00 am.

7. On February 17, 2012, MAHONEY arrived at a prearranged restaurant in Hilliard, Ohio (in the Southern District of Ohio). Members of the Franklin County ICAC contacted MAHONEY and advised him that he was under investigation. MAHONEY had in his possession the following items: Condoms, lubricant, synthetic marihuana, Extenze Pills, and miscellaneous drug paraphernalia.

8. MAHONEY was read his Miranda Warnings, signed a form indicating that he understood his rights, and agreed to be interviewed. Your Affiant interviewed MAHONEY. During the course of the interview, MAHONEY admitted that he had chatted online with what he believed to be a 15-year-old girl. MAHONEY further admitted that he had arrived to meet the 15-year-old girl and have sex with her. MAHONEY also admitted that he intended to use his cell phone to photograph the sexual activity.

9. During the course of the interview, MAHONEY also admitted that in approximately 2006, he had engaged in sexual activity with a juvenile known to him.

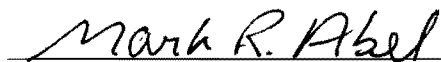
10. MAHONEY also admitted to using the peer-to-peer program Gigatribe to download files containing child pornography to a laptop computer. MAHONEY stated that the laptop computer was currently at his residence 3661 Creekwood Ave, Columbus, OH 43223 (in the Southern District of Ohio)

Based on the foregoing, it is your affiant's belief that there is probable cause that **Patrick MAHONEY** knowingly attempt to entice a minor to engage in sexually explicit conduct using a facility of interstate commerce, in violation of Title 18, United States Code, Sections 2422 (b)



Cameron D. Bryant  
Special Agent  
Immigration and Customs Enforcement

SWORN AND SUBSCRIBED TO BEFORE ME  
THIS 17th DAY OF February 2012.



Mark R. Abel  
United States Magistrate  
United States District Court  
Southern District of Ohio